## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	Chapter 11
FIELDWOOD ENERGY LLC, et al.,	§	
	§	Case No. 20-33948 (MI)
Debtors <sup>1</sup>	§	

### **VERIFIED RULE 2019 STATEMENT OF MULTIPLE REPRESENTATION**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, the undersigned counsel files this Verified Statement of Multiple Representation to provide the following information:

- 1. Cain & Skarnulis PLLC represents the following parties as bankruptcy counsel in connection with the above-captioned matter with Arnold & Itkin LLP representing the following parties as state litigation counsel:
  - a. Brian Cloyd
  - b. Lewis Andrews
  - c. Patrick Burnett
- 2. The addresses for each of these parties are shown on Exhibit A attached hereto.
- 3. The parties listed above and on Exhibit A are each claimants, and the nature and principal amount of each of their claims is described on Exhibit A attached hereto.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

4. Each of the parties listed on Exhibit A has consented to this multiple representation by Cain & Skarnulis PLLC and Arnold & Itkin LLP in the above-captioned matter.

Respectfully submitted this 3rd day of June 2021.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Verified Rule 2019 Statement of Multiple Representation has been served on counsel for Debtors, Debtors, the U.S. Trustee, as well as all parties receiving or entitled to notice through CM/ECF and in accordance with the Rules on this 3rd day of June 2021.

\_\_\_\_\_\_\_/s/ Ryan E. Chapple
Ryan E. Chapple

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	Chapter 11
Fieldwood Energy, LLC, et al.,	§	
	§	0 ()
	§	Case No. 20-33948 (MI)
	8	
Debtors	§	

### **VERIFICATION**

THE STATE OF TEXAS §
COUNTY OF HARRIS §

BEFORE ME, personally appeared Adam D. Lewis, who after being duly sworn, did state:

"I am one of the trial litigation attorneys of record for Brian Cloyd, Lewis Andrews, and Patrick Burnett. I have read the Verified Rule 2019 Statement of Multiple Representation and know the contents to be true and correct to the best of my knowledge and belief."

Adam D/Lewis, Affiant

SWORN TO and subscribed before me this day of day of 2021.

CRYSTAL A. DELEON
Notary Public, State of Texas
Comm. Expires 09-15-2021
Notary ID 125600447

Notary Public, State of Texas Commission Expires: 9-15-2021

### **EXHIBIT A**

Name & Address	Nature of Claim Against the Debtors	Principal Amount of Claim <sup>2</sup>
Brian Cloyd c/o Arnold & Itkin LLP 6009 Memorial Drive Houston, Texas 77007	Maritime tort claimant with in personam claims against Fieldwood Energy LLC and Fieldwood Energy Offshore LLC under the Jones Act and general maritime law and in rem claims against the D/B THOR.	Unliquidated. Claims pending against Debtors in Cloyd v. Fieldwood Energy Offshore, Inc. d/b/a Fieldwood Energy (Texas), Inc., et al., No. 4:20-CV-04032, United States District Court for the Southern District of Texas.
Lewis Andrews c/o Arnold & Itkin LLP 6009 Memorial Drive Houston, Texas 77007	Maritime tort claimant with in personam claims against Fieldwood Energy LLC and Fieldwood Energy Offshore LLC under the Jones Act and general maritime law and in rem claims against the D/B THOR.	Unliquidated. Claims pending against Debtors in Andrews and Burnett v. Fieldwood Energy Offshore, Inc. d/b/a Fieldwood Energy (Texas), Inc., et al., No. 4:20-CV-04009, United States District Court for the Southern District of Texas.
Patrick Burnett c/o Arnold & Itkin LLP 6009 Memorial Drive Houston, Texas 77007	Maritime tort claimant with in personam claims against Fieldwood Energy LLC and Fieldwood Energy Offshore LLC under the Jones Act and general maritime law and in rem claims against the D/B THOR.	Unliquidated. Claims pending against Debtors in Andrews and Burnett v. Fieldwood Energy Offshore, Inc. d/b/a Fieldwood Energy (Texas), Inc., et al., No. 4:20-CV-04009, United States District Court for the Southern District of Texas.

<sup>&</sup>lt;sup>2</sup> This statement is not intended as consent pursuant to 28 U.S.C. § 157(c)(2) or waiver of the right to liquidation or estimation of unliquidated personal injury claims for purposes of distribution outside of the bankruptcy proceeding pursuant to 28 U.S.C. § 157(b)(2)(B) or waiver of the right to trial by jury pursuant to 28 U.S.C. § 1411.